



Advice NI submission re Water Review

Strand 2

Background

Advice NI is a membership organisation that exists to provide leadership, representation and support for independent advice organisations to facilitate the delivery of high quality, sustainable advice services. Advice NI exists to provide its members with the capacity and tools to ensure effective advice services delivery. This includes: advice and information management systems, funding and planning, quality assurance support, NVQs in advice and guidance, social policy co-ordination and ICT development.

Membership of Advice NI is normally for organisations that provide significant advice and information services to the public. Advice NI has over 70 member organisations operating throughout Northern Ireland and providing information and advocacy services to over 150,000 people each year dealing with over 237,000 enquiries on an extensive range of matters including: social security, housing, debt, consumer and employment issues. For further information, please visit www.adviceni.net.

Water Review

Advice NI would refer to the points made in our Strand 1 submission and in particular would advocate the following:

“Advice NI sees protection of the most vulnerable low income households as being our primary concern. With that in mind we would call for 100% relief for those on the lowest incomes, namely people on means tested benefits.”

100% Relief Low Income Households

The argument has been put forward that everyone must pay something in order that they can understand that water is a scarce, valuable resource. Advice NI does not subscribe to this point of view. It has been accepted that a relief scheme is needed therefore the focus must be on ensuring that the most effective relief scheme is put in place to protect the most vulnerable low income households. To try to combine the development of a relief scheme with ideologies around valuing water as a commodity will simply dilute the effectiveness of what the relief scheme is trying to achieve. As previously highlighted: “The positive impacts of introducing an adequate relief scheme would include making the whole water charging issue less contentious; less to be spent on debt management and recovery; less clogging up of court system re non payment.”

Relief Scheme Delivery Mechanism

Advice NI believes that a single itemised bill covering both rates and water charges, centrally administered would make the most sense from an economic and a commonsense point of view. It therefore follows that the relief scheme for water charges should be integrated within the rates relief scheme to (1) avail of efficiencies of administration; (2) to prevent the establishment of an expense additional scheme; and (3) to maximise the potential for take-up among low income households.

Within this integrated approach, one application should trigger entitlement to both rates and water relief. Also given the situation with HMRC in recent days, this streamlined, centralised approach would seem to offer the most security in terms of administration.

Whilst supporting this integrated approach, Advice NI would voice concerns around the ability of any scheme to cope. We are aware of current problems associated with the introduction of a new rates relief IT system and we would urge that an extensive period of testing be conducted on any new IT system which would be supporting an integrated rates and water relief scheme. Staff and decision makers will also need to be adequately supported and trained to ensure the smooth introduction of any scheme.

Take-Up

Whilst integration with the rates relief scheme should enable a water relief scheme to get of to a running start, there needs to be a focus on benefit take-up to ensure that vulnerable, low income households actually receive the support to which they are entitled. Advice NI would advocate that a take-up strategy and implementation plan is developed to ensure maximum support is being provided to those who need it most.

Independent, Accountable Governance & Scrutiny Structures

Advice NI believes that there needs to be clearly demonstrable evidence that Northern Ireland Water Ltd has governance structures which are independent and accountable. The issue of public confidence has been referred to by all stakeholders as being of fundamental importance. For example, the fact that the IWRP panel statistical information regarding the level that water charges should be set at differs so significantly from 'official' information to date highlights that not only is independent accountability and scrutiny desirable but essential. This independent, 'accountability and scrutiny' role should involve the Regulator, the relevant local government Minister, the Consumer Council and be enshrined in legislation.

Public Consultation

Finally Advice NI would make comment on ensuring public involvement in the process of debating water issues. It is important that people have every chance to feed in and express their views. Regarding the latter point, Advice NI believes that more could be done to actively engage with a wider range of stakeholders– most importantly the general public who are most affected by these issues. Advice NI would offer the eConsultation service as one of a range of potential tools for maximising participation and we would ask the Department, Government and all key decision makers to keep this offer under review.

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